



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

January 23, 2017
Certified Mail/Return
7012 3460 0003 1112 7802

Willow Creek Christian School
P.O. Box 666
Willows, CA 95988

Attention: Wes Giesbrecht, Head of Maintenance

Subject: **Willow Creek Christian School, Public Water System No. 1100104 – Citation No. 21-17C-004 for failure to follow permit conditions.**

The Willow Creek Christian School water system (System) failed to follow permit conditions specified in Permit No. 01-21-16(P)11002, issued September 1, 2016. Specifically, since the issuance of said permit, the System has failed to monitor hexavalent chromium levels in the treated water and failed to submit monthly treatment records to the Division. As a result of these failures, the Division hereby issues the enclosed Citation to the System.

Be advised that this citation imposes a civil penalty of \$500.00.

Section 116577 of the California Safe Drinking Water Act provides for the Division to be reimbursed by the public water system for costs incurred for preparing and issuing a citation. Currently the hourly rate is approximately \$163.00 per hour.

If you have any questions please call Paul Rowe at (530) 224-4866 or contact me directly at (530) 224-4861.

A handwritten signature in black ink, appearing to read "R. Crenshaw".

Reese B. Crenshaw, P.E.
Valley District Engineer
DRINKING WATER FIELD
OPERATIONS BRANCH

Enclosures

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

364 Knollcrest Drive, Suite 101, Redding, CA 96002 | www.waterboards.ca.gov

1 **Citation No. 21-17C-004**

2
3 **STATE WATER RESOURCES CONTROL BOARD**

4 **DIVISION OF DRINKING WATER**

5
6 **Public Water System:** Willow Creek Christian School

7 **Water System No.:** 1100104

8
9 **To:** Willow Creek Christian School
10 Attn: Wes Giesbrecht, Head of Maintenance
11 P.O. Box 666
12 Willows, CA 95988

13
14 **Issued:** January 23, 2016
15 VIA CERTIFIED MAIL
16
17

18 **CITATION FOR NONCOMPLIANCE**
19 **With the California Health and Safety Code**
20 **Section 116525**

21
22 Section 116650 of the California Health and Safety Code (CHSC) authorizes the
23 issuance of a citation for failure to comply with a requirement of the California Safe
24 Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with
25 Section 116270), or any regulation, standard, permit, or order issued thereunder.
26

1 The State Water Resources Control Board (hereinafter "Board"), acting by and
2 through its Division of Drinking Water (hereinafter "Division") and the Deputy Director
3 for the Division, hereby issues a citation to Willow Creek Christian School for violation
4 of Section 116540 of the CHSC and permit conditions of Permit No. 01-21-
5 16(P)11002, issued September 1, 2016.

6 7 **APPLICABLE AUTHORITIES**

8 See Attachment 'A' for Applicable Authorities
9

10 **STATEMENT OF FACTS**

11 Willow Creek Christian School (hereinafter, "System") is classified as a non-transient
12 non-community water system serving approximately 150 people. On September 1,
13 2016 the System was issued Permit No. 01-21-16(P)11002 from the Division for the
14 operation of the water system as well as the operation of a hexavalent chromium
15 treatment system. As specified in permit condition "c", the System is required to
16 monitor hexavalent chromium levels in the treated water by collecting monthly
17 samples to be analyzed. Furthermore, as specified in permit condition "d", the System
18 is required to submit to the Division monthly treatment records by the 10th day of each
19 following month. Although the System has been monitoring raw water hexavalent
20 chromium levels, the Division has not received proof that the treated water is being
21 collected and analyzed for hexavalent chromium levels, nor has the Division received
22 monthly treatment records since the issuance of the permit.

23 24 **DETERMINATIONS**

25 The Division has determined that the System violated Section 116540(a) of the CHSC
26 and permit conditions c & d of Permit No. 01-21-16(P)11002, in that it failed to test the
27 System's treated water for hexavalent chromium on a monthly basis as well as failed

1 to submit monthly treatment records to the Division by the 10th day of each following
2 month.

3
4 **ADMINISTRATIVE PENALTY**

5 Sections 116650(d) and 116650(e) of the California Health and Safety Code allow for
6 the assessment of a penalty for failure to comply with requirements of the California
7 SDWA.

8
9 For failure to comply with Section 116540(a) of the CHSC and permit conditions c & d
10 of Permit No. 01-21-16(P)11002, the Division hereby assesses the Water System a
11 penalty of **\$500.00**.

12
13 **DIRECTIVES**

14 The System is hereby directed to take the following action:

- 15
16 1. **Submit to the Division by March 20, 2017, a check for the penalty of \$500.00**
17 **imposed by this Citation.** The citation number (21-17C-004) shall be written on
18 the check. The check shall be made payable to the **California Division of**
19 **Drinking Water – Safe Drinking Water Account** and mailed to the Board along
20 with **Attachment ‘B’** entitled “Notice of Citation Issuance.”
21
22 2. Complete and return **Attachment ‘C’** entitled “Compliance Certification” to the
23 address listed below by **April 3, 2017**.

24
25 Reese B. Crenshaw, P. E.

26 Valley District Engineer

27 Drinking Water Field Operations

1 Division of Drinking Water
2 State Water Resources Control Board
3 364 Knollcrest Drive, Suite 101
4 Redding, CA 96002
5 (530) 224-4800
6

7 Nothing in this Citation relieves the System of its obligation to meet the requirements
8 of Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking
9 Water Act), or any regulation, permit, standard or order issued or adopted thereunder.
10

11 The Division reserves the right to make such modifications to this Citation, as it may
12 deem necessary to protect public health and safety. Such modifications may be
13 issued as amendments to this Citation and shall be effective upon issuance.
14

15 **FURTHER ENFORCEMENT ACTION**

16 The California SDWA authorizes the Board to: issue citation with assessment of
17 administrative penalties to a public water system for violation or continued violation of
18 the requirements of the California SDWA or any permit, regulation, permit or order
19 issued or adopted thereunder including, but not limited to, failure to correct a violation
20 identified in a citation or compliance order. The California SDWA also authorizes the
21 Board to take action to suspend or revoke a permit that has been issued to a public
22 water system if the system has violated applicable law or regulations or has failed to
23 comply with an order of the Board; and to petition the superior court to take various
24 enforcement measures against a public water system that has failed to comply with
25 orders of the Board. The Board does not waive any further enforcement action by
26 issuance of this citation.
27

1 **PARTIES BOUND**

2 This Citation shall apply to and be binding upon the System, its officers, directors,
3 agents, employees, contractors, successors, and assignees.

4
5 **SEVERABILITY**

6 The directives of this Citation are severable, and the System shall comply with each
7 and every provision thereof notwithstanding the effectiveness of any other provision.

8
9
10
11 1/23/2017

12 Date

Richard L. Hinrichs

Richard L. Hinrichs, P.E., Chief

Northern California Section

Division of Drinking Water

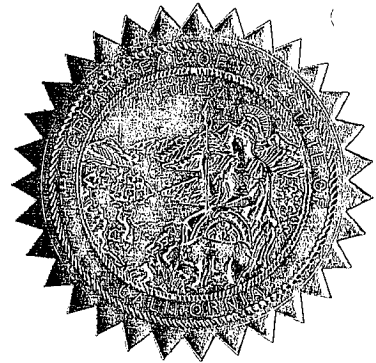
State Water Resources Control Board

13
14
15
16
17 **Attachments:**

18 Attachment 'A' – Applicable Authorities

19 Attachment 'B' – Notice of Citation Issuance

20 Attachment 'C' – Compliance Certification



APPLICABLE AUTHORITIES

Section 116650 of the CHSC states:

- (a) If the division determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the division may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.*
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.*
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.*
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).*
- (e) The division may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation*

occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.

Section 116540(a) of the CHSC states:

- (a) Following completion of the investigation and satisfaction of the requirements of paragraphs (1) and (2), the state board shall issue or deny the permit. The state board may impose permit conditions, requirements for system improvements, technical, financial, or managerial requirements, and time schedules as it deems necessary to ensure a reliable and adequate supply of water at all times that is pure, wholesome, potable, and does not endanger the health of consumers.*

Permit conditions 2(a-e) of Permit No. 01-21-16(P)11002 state:

- a) The totalizer on the Well 01 flow meter must be read and recorded at least once each month.*
- b) The minimum grades of operator to oversee this water system and sign all records shall be Treatment Grade 1 and Distribution Grade 1. If the water system adds continuous chlorination, the minimum grade treatment operator shall be Treatment Grade 2.*
- c) The locations and frequency of hexavalent chromium sampling shall be as follows:*
- 1. Treated water: at least one monthly sample and at least one sample ("regeneration sample") just prior to each regeneration (i.e., after at least 90 percent of design holding capacity has been spent and no more than 10 percent capacity remains before next*

regeneration event). If timed correctly, the monthly sample and the regeneration sample can be the same.

II. Raw water: at least one quarterly sample.

III. Total chromium results may be substituted for hexavalent chromium results, provided the System submits and the Division approves data showing that total chromium test results are representative of the hexavalent chromium concentration. Any total chromium test method used in lieu of a hexavalent chromium method shall be approved for drinking water, per Title 40, Code of Federal Regulations, Part 136, and shall have a reporting limit not to exceed 0.001 mg/L.

d) The following monthly treatment records shall be signed by the chief treatment operator and submitted to the Division by the 10th day of the following month.

I. Total gallons of water treated during the month

II. Results of hexavalent chromium testing, or if allowed under 2.c).iii, total chromium testing.

III. Date of each regeneration cycle for softener and hexavalent chromium treatment vessels.

IV. Amount of salt used to regenerate the softener and the hexavalent chromium treatment vessels.

V. Notes and comments

e) A designated chief or shift treatment operator shall visit the treatment plant at least once per month

**STATE OF CALIFORNIA
Division of Drinking Water
State Water Resources Control Board**

Notice of Citation Issuance

System Name: Willow Creek Christian School

System Number: 1100104

Background Statement

During the month of January 2017, the Division of Drinking Water issued Citation Number 21-17C-004 to the Willow Creek Christian School water system. The citation carried an administrative penalty in the amount of \$500.00

Method of Payment

A check for the total amount of the administrative penalty and a copy of this form shall be submitted to the Division by **March 20, 2017**. The citation number shall be written on the check. The check shall be made payable to the **California Division of Drinking Water Safe Drinking Water Account** and submitted to:

SWRCB Accounting Office
Attn: Drinking Water Program
PO Box 1888
Sacramento, CA 95812-1888

Please attach check below:

COMPLIANCE CERTIFICATION

Citation Number: **21-17C-004**

Name of Water System: **Willow Creek Christian School**

System Number: **1100104**

As required by Section 116450 of the California Health and Safety Code, I certify that the Encinal Elementary School water system complied with the directives of this citation as indicated below:

<u>Required Action</u>	<u>Date Completed</u>
Payment of \$500.00 Administrative Penalty to the Division of Drinking Water in Sacramento, as required by Directive 1	_____
_____	_____
Signature of Water System Representative	Date

Attach a copy of the check for payment of the administrative penalty.

<p>THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION NO LATER THAN APRIL 3, 2017</p>
--

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.